

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE:	)	CHAPTER 13
	)	
Harry S Goines,	)	CASE NO. 11-76654-JRS
Alberta Burnice Goines,	)	
	)	
Debtors.	)	

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**AMENDED APPLICATION TO APPROVE EMPLOYMENT OF SPECIAL COUNSEL**

COME NOW Debtors, by and through undersigned counsel, and respectfully request that this Court approve the employment of Jeffrey Flynn as Special Counsel, specifically to represent the Debtor/wife as counsel of record with regard to a Social Security Claim. In support of this application, Debtors show to this Court the following:

1.

On September 13, 2011, Debtors filed a Petition for relief under Chapter 13 of the Bankruptcy Code. Debtors' Chapter 13 Plan was confirmed on December 5, 2011.

2.

On or about October 18, 2010, Debtor/wife retained Jeffrey Flynn as counsel to represent her in a Social Security Claim.

3.

Debtors desire that the Court approve the employment of Jeffrey Flynn as Special Counsel for the express purpose of representing Debtor/wife in matters relating to her Social Security Claim.

4.

Debtor/wife has employed Jeffrey Flynn for professional services and agreed to payment agreement in contract to hire Special Counsel. All remaining compensation paid to Debtor/wife is subject to approval by this Honorable Court. The attorney-client agreement between Debtor/husband and Counsel is attached hereto as Exhibit "A". Debtors believe that approval of the employment of Jeffrey Flynn as Special Counsel would be in the best interest of the estate.

5.

Debtors acknowledge that any money received or owed in the lawsuit is subject to the approval of the Chapter 13 Trustee and the United States Bankruptcy Court.

6.

The professional services that Jeffrey Flynn is to render include, but are not limited to:

- a) Providing Debtor/wife with legal and counseling services regarding Social Security Claims;
- b) Preparing on behalf of Debtor/wife the necessary applications, pleadings, forms, motions, answers, orders and other legal papers pursuant to the matter; and,
- c) Performing all other related legal services for Debtor/wife that are reasonably necessary.

7.

To the best of Debtors' knowledge, Jeffrey Flynn does not hold or represent any interest adverse to the estate and is a disinterested person within the meaning of 11 U.S.C. § 101 (14). Specially does not have any connection to creditors or any other party in interest herein, the United States Trustee, the Chapter 13 Trustee, or any person employed in the office of the Chapter 13 Trustee, and represents no interest adverse to the Debtors with respect to any matter for which employed by Debtor/wife. The Affidavit of Counsel is attached hereto as Exhibit "B".

WHEREFORE, Debtors pray that this Court approve Debtor/wife's employment of Jeffrey Flynn as Special Counsel in Debtor/wife's Social Security Claim as provided under Chapter 13 of the Bankruptcy Code, with all compensation to be paid subject to the Court's approval.

This 11th day of April 2012:

Respectfully submitted by:

By: Jordan Van Matre /s  
Jordan Van Matre  
Attorney for Debtors  
GA Bar No. 867176  
Robert J. Semrad & Associates  
101 Marietta Street  
Suite 3600  
Atlanta, GA 30303  
(678) 668-7160

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**CERTIFICATE OF SERVICE:**

I hereby certify that I am over the age of 18 and that on this day I served a copy of the foregoing Amended Application to Approve Employment of Special Counsel filed in this Bankruptcy Case upon the following by depositing a copy of same in the United States Mail with sufficient postage thereon to ensure delivery to:

**Harry S Goines**  
**Alberta Burnice Goines**  
460 Thomasville Blvd SE  
Atlanta, GA 30315

**U.S. Trustee**  
Office of the US Trustee  
Suite 362  
75 Spring Street, SW  
Atlanta, GA 30303

**Jeffrey Flynn**  
1447 Peachtree Street NE  
Suite 414  
Atlanta, GA 30309

I further certify that, by agreement of parties, Adam M. Goodman, Standing Chapter 13 Trustee, was served via the ECF electronic mail/noticing system.

This 11th day of April 2012:

Respectfully submitted by:

By: Jordan Van Matre /s  
Jordan Van Matre  
Attorney for Debtors  
GA Bar No. 867176  
Robert J. Semrad & Associates  
101 Marietta Street  
Suite 3600  
Atlanta, GA 30303  
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